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May 13, 2024

Via ECF
Honorable Dale E. Ho
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: **Hildreth Real Estate Advisors LLC v. Galvis et al.**
Docket No.: 1:23-cv-09372-(DEH)
Our File No.: 146-2023

Dear Judge Ho:

This law firm represents plaintiff Hildreth Real Estate Advisors LLC ("Plaintiff") in the above-referenced matter. We write in regard to the Court's order directing Plaintiff to file the proposed default judgment order against defendant Fortitude Ventures III LLC ("Fortitude") by May 21, 2024. While Plaintiff has suffered as a result of Fortitude's conduct complained of, Plaintiff cannot determine or establish the extent of those damages without discovery, including possibly third-party discovery. As the appearing defendant, Felipe Galvis ("Galvis"), is the sole member of Fortitude, discovery concerning Galvis will clearly pertain to Fortitude. Plaintiff therefore respectfully requests that the Court permit Plaintiff to seek the default judgment against Fortitude, but to defer providing the proposed default judgment order until after Plaintiff can complete discovery.

Thank you for your attention to this matter.

Respectfully submitted,

MILMAN LABUDA LAW GROUP, PLLC

/s/_____
Netanel Newberger

Application **GRANTED**.

The conference scheduled for June 11, 2024, *see* ECF No. 32, is **CANCELLED**. Plaintiff shall file its proposed default judgment order by **July 20, 2024**. It is further **ORDERED** that Plaintiff serve Defendant via overnight courier with a copy of this Order within two business days and file proof of service on the docket.

The Clerk of Court is directed to close ECF No. 33.

SO ORDERED.



Dale E. Ho
United States District Judge
Dated: May 16, 2024
New York, New York

cc: Felipe Galvis